

FILED
Clerk
District Court

APR 21 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

MARK B. HANSON, ESQ.
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Beach Road, Garapan
PMB 738 P.O. Box 10,000
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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,

vs.

JUNG JIN CORPORATION, a CNMI corporation,
ASIA ENTERPRISES, INC., a CNMI corporation,
PARK HWA SUN and KIM HANG KWON,

Defendants.

DECLARATION OF
COUNSEL FOR PLAINTIFFS

DATE: 5/25/06
TIME: 8:30am

I, MARK B. HANSON, do hereby declare as follows:

- I am competent to testify, and if called to testify, I would do so in accord herewith.
- I am the attorney for plaintiffs in the above-captioned case.

DAMAGE CALCULATION TABLES FOR PLAINTIFFS:

- Attached hereto as Exhibit "A" is a Calculation of Damages for Plaintiff Li Ying Hua.
- Exhibit A is a table representation of the damages to which Plaintiff Li Ying Hua testifies in her declaration dated March 28, 2006.
- Attached hereto as Exhibit "B" is a Calculation of Damages for Plaintiff Xu Jing Ji.
- Exhibit B is a table representation of the damages to which Plaintiff Xu Jing Ji testifies in her declaration dated March 28, 2006.
- Attached hereto as Exhibit "C" is a Calculation of Damages for Plaintiff Li Zheng

ORIGINAL

1 Zhe.

2 8. Exhibit C is a table representation of the damages to which Plaintiff Li Zheng Zhe
3 testifies in his declaration dated March 28, 2006.

4 9. In all three tables, Plaintiffs' monthly salary was converted to a bi-weekly figure by
5 multiplying the monthly salary (before deductions for taxes) by 12 and dividing the total by 26.

6 10. In Exhibits A and B, all past wages due and liquidated damages were calculated based
7 on the provisions, including the three (3) year statute of limitations period, provided by the Fair
8 Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* ("FLSA"). All prospective wages due and liquidated
9 damages were based on common law contract principals and statutory damages provided for in 3
10 C.M.C. § 4447(d).

11 11. In Exhibit C, all past wages and liquidated damages for periods during and after the
12 pay period ending July 14, 2002 were calculated based on the provisions, including the three (3) year
13 statute of limitations period, provided by the FLSA. Past wages for the pay period ending June 16,
14 2002 and June 30, 2002, and all prospective wages due and liquidated damages thereon, were based
15 on common law contract principals and statutory damages provided for in 3 C.M.C. § 4447(d).

16 • DEPOSITIONS OF DEFENDANTS PARK HWA SUN AND JUNG JIN CORP.:

17 12. On January 10, 2006, after discussing the time and date with, Stephen J. Nutting, the
18 attorney for defendants Jung Jin Corporation and Park Hwa Sun, Plaintiffs noticed the depositions
19 of said defendants.

20 13. The notice of deposition of Jung Jin Corporation was made pursuant to Fed. R. Civ.
21 P. 30(b)(6) and was served on Stephen J. Nutting on January 10, 2006. Therein, said deposition was
22 noticed to commence at 9:00 a.m. on Tuesday, January 24, 2006. A true and accurate copy of that
23 Notice is attached hereto as Exhibit "D."

24 14. The notice of deposition of Park Hwa Sun was made pursuant to Fed. R. Civ. P.
25 30(b)(1) and was served on Stephen J. Nutting on January 10, 2006. Therein, said deposition was
26

1 noticed to commence at 9:00 a.m. on Friday, January 27, 2006. A true and accurate copy of that
2 Notice is attached hereto as Exhibit "E."

3 15. On January 24, 2006, as the officer of the deposition, I started the deposition of Jung
4 Jin Corporation at the time agreed by the parties.

5 16. Initially, I believed, and it appeared that Stephen J. Nutting believed, that the
6 individual that would testify for Jung Jin Corporation was defendant Kim Hang Kwon. The
7 documents Plaintiffs were able to obtain suggested that Mr. Kim was and officer, director and
8 shareholder of Jung Jin Corporation.

9 17. Kim Hang Kwon was sworn in and questioning began, but when asked if he was
10 appearing on behalf of Jung Jin Corporation pursuant to the Rule 30(b)(6) Notice, Kim Hang Kwon
11 stated that he was not. Jung Jin Depo. Trans., p. 6, lines 3-4.

12 18. I then asked Mr. Kim and Mr. Nutting if anyone was going to appear for Jung Jin
13 Corporation. Mr. Nutting responded: "No, Miss Park Hwa Sun would be the individual to appear
14 on their behalf, and as we discussed, she's not on island." Jung Jin Depo. Trans., p. 6, lines 11-15.

15 19. Just prior to beginning the deposition of Jung Jin Corporation, Mr. Nutting and I
16 discussed the fact that Park Hwa Sun had left for Korea a day or two earlier and no plans of returning
17 to the Commonwealth.

18 20. The parties agreed, and the deposition of defendant Asia Enterprises, Inc. immediately
19 followed.

20 21. Therein, Kim Hang Kwon, testifying on behalf of Asia Enterprises, Inc. confirmed that
21 Park Hwa Sun had left for Korea the day before, January 24, 2006.

22 22. Thereafter, Park Hwa Sun did not appear for her own noticed deposition and, as of
23 March 24, 2006, Park Hwa Sun had not returned to the Commonwealth.
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2 I swear under the penalty of perjury that the above-stated facts are true and correct, and that
3 this Declaration was executed this 5th day of April, 2006 in Saipan, Commonwealth of the Northern
4 Mariana Islands.

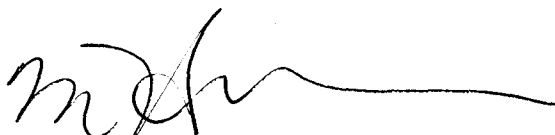
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7 MARK B. HANSON
8 Attorney for Plaintiffs
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Exhibit A

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

COMPLAINT FILED June 29, 2005
ENDED EMPLOYMENT May 4, 2005
CONTRACT EXP. January 14, 2006

\$655.00 processing fees and related expenses for first contract
\$150.00 per/mo rent deducted for employer provided housing (3 months)
\$215.00 deducted for shortages

FLSA PERIOD BEGAN (April 4, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

4/6/03	24.0		3.05	4.58	73.20	0.00	41.00	32.20			32.20
4/20/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
5/4/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
5/18/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
6/1/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
6/15/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
6/29/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
7/13/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
7/27/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
8/10/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
8/24/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
9/7/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08

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A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

9/21/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/5/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
10/19/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/2/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/16/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
11/30/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/14/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/28/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
1/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
1/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
2/8/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	100.00	424.04	848.08
2/22/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08

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A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

3/7/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	100.00	424.04	848.08
3/21/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
4/4/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	100.00	424.04	848.08
4/18/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
5/2/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	250.00	574.04	1148.08
5/16/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
5/30/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
6/13/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	230.00	554.04	1108.08
6/27/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
7/11/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
7/25/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
8/8/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08

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A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

8/22/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
9/5/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
9/19/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
10/3/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
10/17/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
10/31/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
11/14/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
11/28/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
12/12/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
12/26/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
1/9/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
1/23/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08

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FLSA PERIOD BEGAN (April 4, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

2/6/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
2/20/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
3/6 /05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
3/20/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
4/3/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
4/17/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
5/1/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	215.00	539.04	1078.08
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

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A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI YING HUA CALCULATION OF DAMAGES

(April 4, 2003 to January 14, 2006)

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 CONTRACT EXP. January 14, 2006

\$655.00 processing fees and related expenses for first contract
 \$150.00 per/mo rent deducted for employer provided housing (3 months)
 \$215.00 deducted for shortages

FLSA PERIOD BEGAN (April 4, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	40.0		3.05	4.58	122.00	0.00		122.00		122.00	244.00
	5,824	4,752			17,763.20	21,764.16	17,000.00	22,527.36	1,320.00	23,815.16	47,662.52

Exhibit B

XU JING JI CALCULATION OF DAMAGES

(November 28, 2003 to January 24, 2006)

COMPLAINT FILED June 29, 2005
 EMPLOYMENT TERMINATED April 25, 2005
 CONTRACT EXP. January 24, 2006

\$730.00 processing fees and related expenses for first contract
 \$150.00 for housing deductions (8 months)
 \$125.00 deducted for shortages

FLSA PERIOD BEGAN (November 28, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due
11/30/03	36.0	0.0	3.05	4.58	109.80	0.00	109.80	0.00		0.00	0.00
12/14/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
12/28/03	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	75.00	422.04	844.08
1/11/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
1/25/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04		347.04	694.08
2/8/04	80.0	88.0	3.05	4.58	244.00	403.04	300.00	347.04	100.00	447.04	894.08
2/22/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
3/7/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	100.00	424.04	848.08
3/21/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
4/4/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	100.00	424.04	848.08
4/18/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
5/2/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	250.00	574.04	1148.08
5/16/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08

XU JING JI CALCULATION OF DAMAGES

(November 28, 2003 to January 24, 2006)

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\$730.00 processing fees and related expenses for first contract
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FLSA PERIOD BEGAN (November 28, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

5/30/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
6/13/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	230.00	554.04	1108.08
6/27/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
7/11/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
7/25/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
8/8/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
8/22/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
9/5/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
9/19/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
10/3/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
10/17/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
10/31/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
11/14/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08

XU JING JI CALCULATION OF DAMAGES

(November 28, 2003 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$730.00 processing fees and related expenses for first contract
\$150.00 for housing deductions (8 months)
\$125.00 deducted for shortages

FLSA PERIOD BEGAN (November 28, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

11/28/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
12/12/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	150.00	474.04	948.08
12/26/04	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04	75.00	399.04	798.08
1/9/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
1/23/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
2/6/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
2/20/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
3/6/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
3/20/05	80.0	88.0	3.05	4.58	244.00	403.04	323.00	324.04		324.04	648.08
4/3/05	80.0	88.0	3.05	4.58	244.00	403.04	73.20	573.84	125.00	698.84	1397.68
4/17/05	80.0	64.0	3.05	4.58	244.00	293.12		537.12		537.12	1074.24
5/1/05	80.0	44.0	3.05	4.58	244.00	201.52		445.52		445.52	891.04
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

XU JING JI CALCULATION OF DAMAGES

(November 28, 2003 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$730.00 processing fees and related expenses for first contract
\$150.00 for housing deductions (8 months)
\$125.00 deducted for shortages

FLSA PERIOD BEGAN (November 28, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

XU JING JI CALCULATION OF DAMAGES

(November 28, 2003 to January 24, 2006)

COMPLAINT FILED June 29, 2005
 EMPLOYMENT TERMINATED April 25, 2005
 CONTRACT EXP. January 24, 2006

\$730.00 processing fees and related expenses for first contract
 \$150.00 for housing deductions (8 months)
 \$125.00 deducted for shortages

FLSA PERIOD BEGAN (November 28, 2003)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
2/5/06	16.0		3.05	4.58	48.80	0.00		48.80		48.80	97.60
	4,532	3,188			13,822.60	14,601.04	11,050.00	17,373.64	2,055.00	19,428.64	38,857.28

Exhibit C

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

12/02/01	55.0	65.0	3.05	4.58	167.75	297.70	310.00				0.00
12/16/01	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
12/30/01	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
1/13/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
1/27/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
2/10/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
2/24/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
3/10/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
3/24/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
4/7/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
4/21/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
5/5/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
5/19/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

6/2/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00				0.00
6/16/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
6/30/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
7/14/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
7/28/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
8/11/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
8/25/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
9/8/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
9/22/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
10/6/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
10/20/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
11/03/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
11/17/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

12/1/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	50.00	474.40	948.80
12/15/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
12/29/02	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
1/12/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
1/26/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
2/9/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
2/23/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
3/9/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
3/23/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
4/6/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
4/20/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
5/4/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
5/18/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
 EMPLOYMENT TERMINATED April 25, 2005
 CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
 \$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
 CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

6/1/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
6/15/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
6/29/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40	100.00	524.40	1048.80
7/13/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
7/27/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40	100.00	524.40	1048.80
8/10/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
8/24/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40	100.00	524.40	1048.80
9/7/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
9/21/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40	100.00	524.40	1048.80
10/5/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
10/19/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40	100.00	524.40	1048.80
11/2/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80
11/16/03	80.0	130.0	3.05	4.58	244.00	595.40	+15.00	+24.40		+24.40	848.80

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
 EMPLOYMENT TERMINATED April 25, 2005
 CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
 \$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
 CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

11/30/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
12/14/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
12/28/03	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	175.00	599.40	1198.80
1/11/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
1/25/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
2/8/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
2/22/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
3/7/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
3/21/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	100.00	524.40	1048.80
4/4/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
4/18/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
5/2/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
5/16/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

5/30/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
6/13/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
6/27/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
7/11/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
7/25/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
8/8/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
8/22/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
9/5/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
9/19/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
10/3/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
10/17/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
10/31/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
11/14/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

11/28/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
12/12/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
12/26/04	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40	75.00	499.40	998.80
1/9/05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
1/23/05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
2/6/05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
2/20/05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
3/6 /05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
3/20/05	80.0	130.0	3.05	4.58	244.00	595.40	415.00	424.40		424.40	848.80
4/3/05	80.0	130.0	3.05	4.58	244.00	595.40		839.40		839.40	1678.80
4/17/05	80.0	130.0	3.05	4.58	244.00	595.40		839.40		839.40	1678.80
5/1/05	80.0	65.0	3.05	4.58	244.00	297.70		541.70		541.70	1083.40
5/15/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005
EMPLOYMENT TERMINATED April 25, 2005
CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses
\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)
CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

5/29/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/12/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
6/26/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/10/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
7/24/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/7/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
8/21/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/4/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
9/18/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/2/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/16/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
10/30/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
11/13/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00

LI ZHENG ZHI CALCULATION OF DAMAGES

(November 25, 2001 to January 24, 2006)

COMPLAINT FILED June 29, 2005

EMPLOYMENT TERMINATED April 25, 2005

CONTRACT EXP. January 24, 2006

\$875.00 processing fees for contract processing fees and related expenses

\$100.00 per/mo rent for employer provided housing (11/25/01 to 4/30/04)

FLSA PERIOD BEGAN (June 29, 2002)

CONTRACT LIMITATIONS PERIOD (June 5, 2002)

A	B	C	D	E	F	G	H	I	J	K	L
PPE	Regular Hours	OT Hours	Regular Rate/hr	Overtime Rate/hrOT	Regular wages owed	Overtime wages owed	Wages paid	Wages due	Illegal Deductions	Liquidated Damages	Total Due

11/27/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/11/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
12/25/05	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/8/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
1/22/06	80.0		3.05	4.58	244.00	0.00		244.00		244.00	488.00
2/5/06	16.0		3.05	4.58	48.80	0.00		48.80		48.80	97.60
	8,711	11,570			26,568.55	52,990.60	36,000.00	37,886.50	3,000.00	40,886.50	81,773.00

Exhibit D

MARK B. HANSON, ESQ.
First Floor, Macaranas Building
Beach Road, Garapan
PMB 738 P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,)

vs.)

JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)

Defendants.)

NOTICE OF RULE (30)(b)(6)
DEPOSITION OF
JUNG JIN CORPORATION

TO: STEPHEN J. NUTTING, ESQ., Attorney for Defendants

PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil Procedure, on Tuesday, January 24, 2006, at the hour of 9:00 a.m. at the law office of Mark B. Hanson, First Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the Northern Mariana Islands, Plaintiffs' attorney will take the deposition of Defendant JUNG JIN CORPORATION, P.O. Box 503428, Saipan, MP 96950 ("JUNG JIN"), said deposition to continue from day to day until completed. Such deposition will be taken upon oral examination for the purpose of discovery, or as evidence, or both, pursuant to the Federal Rules of Civil Procedure, before the undersigned who will administer the oath and shall be the officer before whom the deposition is taken as that term is used in Fed. R. Civ. P. 28(a).

Step J. Nutting
Attorney at Law
P.O. Box 5093 CHRB
Saipan, MP 96950
1/10/06

1 Pursuant to Rule 30(b)(6), JUNG JIN shall, as known or reasonably available to it, designate
2 and produce for deposition one or more of the JUNG JIN's officers, directors, employees, managing
3 agents, consultants, auditors or other persons who consent to testify on JUNG JIN's behalf as to the
4 subject matters identified below for the time period from January 2001 to the present (unless
5 otherwise stated):

- 6 1. The number of hours worked by Plaintiffs, or any of them, for JUNG JIN or any other person
7 or entity at any time from January 2001 to the present;
- 8 2. The person or persons responsible for recording the time Plaintiffs, or any of them, performed
9 work for JUNG JIN, or any of its owners, officers, agents, or employees, from January 2001 to
10 the present;
- 11 3. The methods and forms of record keeping used by JUNG JIN, or any of its owners, officers,
12 agents, or employees, to record any or all of the time Plaintiffs, or any of them, worked for
13 JUNG JIN, or any of its owners, officers, agents, or employees, any time Plaintiffs, or any of
14 them, performed such work;
- 15 4. Any and all agreements, contracts, or understandings, either written or oral, between Plaintiffs,
16 or any of them, and JUNG JIN, or any of its owners, officers, directors or employees, relating
17 to Plaintiffs', or any of their, employment with, or work performed for, JUNG JIN and/or its
18 owners, officers, directors or employees;
- 19 5. The method, form and amount of payments, and all of them, made by JUNG JIN, or any of
20 its owners, officers, agents, or employees, for any reason or purpose from January 2001 to the
21 present;
- 22 6. The non-cash benefits or other non-cash payments, if any, provided by JUNG JIN, or any of
23 its owners officers, agents, or employees, to Plaintiffs, or any of them, at any time between
24 January 2001 and the present;
- 25 7. Any disciplinary action taken by JUNG JIN, or any of its owners, officers, directors, or
26

- 1 employees against Plaintiffs, or any of them, for any reason at any time from January 2001 to
2 the present, including warning letters, notice of reprimand, suspensions or any other action;
- 3 8. The names, contact terms, work schedules, pay rate, duties and responsibilities, and present
4 whereabouts, if known, of any and all employees of JUNG JIN, or any of its owners, officers,
5 agents, or employees, at any time from January 2001 to the present;
- 6 9. The facts and circumstances surrounding Plaintiffs', or any of their, cessation of work for and
7 employment with JUNG JIN, or any of its owners, officers, agents, or employees, in about
8 April or May 2005;
- 9 10. All information disclosed in Defendants' Initial Disclosures and any supplements thereto up
10 to and including the day of the deposition noticed hereunder including any continuance
11 thereof;
- 12 11. All responses of JUNG JIN to plaintiffs' First Interrogatories to Defendants dated November
13 7, 2005 and any supplements thereto up to and including the day of the deposition noticed
14 hereunder including any continuance thereof;
- 15 12. All responses of JUNG JIN to plaintiffs' First Request for Production of Documents from
16 Defendants dated November 7, 2005 and any supplements thereto up to and including the
17 day of the deposition noticed hereunder including any continuance thereof;
- 18 13. All documents produced or identified in Defendants' Initial Disclosures or in response to any
19 document request or interrogatory served on Defendants by Plaintiff;
- 20 14. All responses to any additional discovery served by Plaintiffs on Defendants, or any of them,
21 prior to the day of the deposition noticed hereunder including any continuance thereof;
- 22 15. The terms and conditions of Plaintiffs' employment with Defendant;
- 23 16. Plaintiffs' allegations in their Verified Complaint;
- 24 17. Defendants' Answer to Plaintiffs' Verified Complaint and the factual basis for the affirmative
25 defenses contained therein;
- 26
27

1 18. Communications, either written or oral, by and between Plaintiffs, or any of them, and JUNG
2 JIN, or any of its owners, officers, agents, or employees, at any time between January 2001 and
3 the present;

4 19. The relationships of the other Defendants to JUNG JIN, including but not limited to any
5 stock ownership, officer, director or manager positions, dates of stock ownership,
6 appointment, election, and/or employment, their duties and responsibilities, and their
7 authority to enter into agreements on behalf of JUNG JIN or otherwise bind JUNG JIN by
8 their actions;

9 20. The operations, income and expenses of JUNG JIN; and

10 21. The assets of JUNG JIN including, but not limited to any actual or intended disposition of
11 such assets.

12 Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the
13 deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.

14 You are invited to attend and cross-examine.

15
16 Respectfully submitted this 10th day of January, 2006.

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MARK B. HANSON

20 First Floor, Macaranas Building
21 Beach Road, Garapan
22 PMB 738, P.O. Box 10,000
23 Saipan, MP 96950

24 Attorney for Plaintiffs
25
26
27

Exhibit E

1 MARK B. HANSON, ESQ.
2 First Floor, Macaranas Building
3 Beach Road, Garapan
4 PMB 738 P.O. Box 10,000
5 Saipan, Mariana Islands 96950
6 Telephone: (670) 233-8600
7 Facsimile: (670) 233-5262

8 Attorney for Plaintiffs

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE
11 NORTHERN MARIANA ISLANDS

12 LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

13 Plaintiffs,)

14 vs.)

15 JUNG JIN CORPORATION, a CNMI corporation,)
16 ASIA ENTERPRISES, INC., a CNMI corporation,)
17 PARK HWA SUN and KIM HANG KWON,)

18 Defendants.)

19 NOTICE OF DEPOSITION
20 OF
21 PARK HWA SUN

22 TO: STEPHEN J. NUTTING, ESQ., Attorney for Defendants

23 PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil
24 Procedure, on Friday, January 27, 2006, at the hour of 9:00 a.m. at the law office of Mark B. Hanson,
25 First Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the Northern
26 Mariana Islands, Plaintiffs' attorney will take the deposition of Defendant PARK HWA SUN, P.O.
27 Box 503428, Saipan, MP 96950, said deposition to continue from day to day until completed. Such
deposition will be taken upon oral examination for the purpose of discovery, or as evidence, or both,
pursuant to the Federal Rules of Civil Procedure, before the undersigned who will administer the
oath and shall be the officer before whom the deposition is taken as that term is used in Fed. R. Civ.
P. 28(a).

Rep 1/10/06 rns
Stephen J. Nutting
Attorney at Law
P.O. Box 5093 CHRB
Saipan, MP 96950

1 Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the
2 deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.
3

4 You are invited to attend and cross-examine.
5

6 Respectfully submitted this 10th day of January, 2006.
7

8 
9 _____
10 MARK B. HANSON

11 First Floor, Macaranas Building
12 Beach Road, Garapan
13 PMB 738, P.O. Box 10,000
14 Saipan, MP 96950

15 Attorney for Plaintiffs
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